

United States District Court
Southern District Of Texas

United States of America,

Plaintiff,

v.

Case No. 4:15-cr-00591-2

Marie Neba,

Defendant.

Emergency Motion for Ruling On Compassionate Release Request

Defendant, Marie Neba (“Neba”), respectfully submits this Emergency Motion for a ruling on Neba’s pending compassionate release motion. Marie Neba is dying. Marie Neba has already needed to be resuscitated once. Neba has been in the hospital for the past few weeks on life support. Neba’s health quickly deteriorated after she contracted COVID-19 while in BOP custody in Fort Worth. Marie Neba will die in the next few weeks, if not days.

The Government did not notify the Court or undersigned counsel of these developments. Undersigned counsel only learned of these developments after private hospital staff contacted Neba’s 19 year old daughter for end-of-life preparations.

Granting a sentence reduction to Neba immediately would not undermine any sentencing purpose. Instead it would be a final merciful act of compassion. Not compassion for the sake of Marie Neba; compassion for the sake of Marie Neba’s children, ages 10 and 19, being able to watch their mother pass without chains on her body. We ask that the Court grant this reduction effective immediately.

Respectfully submitted,

/s/ Zachary L. Newland
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Counsel for Marie Neba

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with lead counsel for the United States in this matter prior to filing this motion. Counsel for the United States indicated that the United States is opposed to the Court granting the relief sought.

/s/ Zachary L. Newland
Zachary L. Newland

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 26th day of August 2020 via CM/ECF on all counsel of record.

/s/ Zachary L. Newland
Zachary L. Newland